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 NATIONAL UNION FIRE INSURANCE
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SANDS, INC. n/k/a LAS
 VEGAS SANDS, LLC; and LAS VEGAS
 SANDS CORP.,

Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA.,

Defendant.

Case No. 2:22-cv-00461-JCM-BNW
 Hon. James C. Mahan

**REVISED STIPULATION AND
 [PROPOSED] ORDER TO EXTEND
 SUMMARY JUDGMENT FILING
 DEADLINE BY THREE WEEKS AND TO
 SET SUMMARY JUDGMENT BRIEFING
 SCHEDULE**
(FIFTH REQUEST)

Pursuant to LR IA 6-1 and LR 26-3, this is the fifth stipulation to extend the deadlines in the
 Scheduling Order (*see* ECF #45, 78, 81, 84). Plaintiffs Las Vegas Sands, Inc. n/k/a Las Vegas
 Sands, LLC, and Las Vegas Sands Corp. (“Plaintiffs”) and Defendant National Union Fire Insurance

Company of Pittsburgh, Pa. (“National Union”) (collectively the “Parties”), by and through their respective counsel of record, hereby stipulate to extend the dispositive motions deadline in the scheduling order (ECF #81) by three weeks, and to set a summary judgment briefing schedule, subject to the Court’s approval, as follows:

1. The Parties have been working diligently and have completed fact and expert discovery.

2. On August 29, 2023, the Parties filed a stipulation requesting a one-week extension for the summary judgment filing deadline. ECF # 84. The Court has not yet ruled on the Parties’ stipulation.

3. Since that time, National Union’s lead counsel (Michael Hartley) has tested positive for COVID, as has his family, and has been experiencing significant symptoms. National Union therefore has requested an additional two-week extension of the summary judgment filing deadline to accommodate this issue. Plaintiffs do not oppose National Union’s requested extension. Mr. Hartley can also provide further information to the Court regarding his circumstances if necessary.

A. Summary Judgment Filing Deadline and Briefing Schedule: The Parties propose extending the disposition motions deadline by three weeks to **September 29, 2023**. The Parties also require additional time to prepare their summary judgment oppositions and replies, and therefore stipulate and agree that oppositions to summary judgment motions are to be filed by **October 27, 2023**, and replies (if necessary) are to be filed by **November 17, 2023**.

Event	Existing Deadline	Proposed Deadline
Dispositive Motion Deadline	September 8, 2023	September 29, 2023
Summary Judgment Oppositions		October 27, 2023
Summary Judgment Replies		November 17, 2023
Pretrial Order	October 9, 2023	30 days after decision on summary judgment or further Court order (LR 26-1(b)(5))

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DATED: September 6, 2023

Respectfully submitted,

PRHLAW LLC
BAUTE CROCHETIERE HARTLEY & McCOY LLP

By: /s/ Michael J. Hartley
Michael J. Hartley
Attorneys for Defendant National Union Fire
Insurance Company of Pittsburgh, Pa.

DATED: September 6, 2023

KEMP JONES, LLP
COHEN ZIFFER FRENCHMAN & McKENNA LLP

By: /s/ Marc T. Ladd
Marc T. Ladd
Attorneys for Plaintiffs

IT IS SO ORDERED.


United States District/Magistrate Judge

Dated: September 6, 2023